# ASH GROVE CEMENT COMPANY

"WESTERN REGION"

**Date:** February 3, 1995

Mr. Fred Austin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98119-3958

Re: Notice of Violation #32844

Dear Mr. Austin,

PSAPCA's Notice of Violation #32844 requested a report from Ash Grove on proposed actions to be taken to achieve continuous compliance. This NOV also instructs Ash Grove to correct cement kiln fugitive emissions, maintain calcine preheater in good working order and prevent deposition of particulate on others property.

The event which occurred on January 23, 1994 during process start up was due to a upset condition and is not typical of a normal start up or operating mode. The upset condition occurred when a plug developed shortly after introducing feed to the system. Material blocked the discharge of the second stage cyclone in the preheater and forced a system shutdown. The cause of the plug is unknown. When the plug was cleared, hot raw feed (fine consistency) behind the obstruction flushed down through the remaining stages of the preheater tower, through the kiln and clinker coolers and out the discharge.

The upset was not caused by poor maintenance or the result of improper operation. The kiln was starting up from a 15 day maintenance period in which refractory was replaced in both the preheater and the kiln. During this period, preheater vessels were checked and showed no indication of a plug. Before shut down on 01/8/95 for this maintenance period, the feed flow through preheater was normal.

Established start up procedures were followed. Temperature at the top or stage 1 of the preheater indicated normal ventilation through the tower. There was no indication of a blockage prior to the introduction of the feed. Upon introducing feed to the system, operations verified material flow through the tower by checking each stage of the preheater. When temperatures throughout the tower began to rise abnormally, each stage in the preheater was once again checked for flow. When the plug was found, the operator immediately shut off the feed. This occurred approximately 45 minutes after introducing feed. This rapid response prevented the accumulation of additional material feed behind the plug.

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Other tower plugs have occurred previously and did not resulted in an emission as in this incident. This emission resulted because the plug occurred high in the preheater and there was little material present in the newly rebricked kiln to impede the material flow. Usually, the material that remains in the kiln forms a dam which slows the flow, keeping it in the kiln.

We look forward to meeting with you to further explain this event. We believe this condition did not occur due to poor operations or maintenance of the preheater. Additionally, the emission was not a normal event and resulted from process start up. Ash Grove is committed and will continue to operate the Seattle Plant in the best manner possible.

Sincerely yours,

Gerald J. Brown
Manager, Safety and Environment

Copy: ESP
NAF
HES